

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

**AMAZON.COM, INC and AMAZON
DATA SERVICES, INC.,**

Plaintiffs,

v.

**WDC HOLDINGS LLC d/b/a
NORTHSTAR COMMERCIAL
PARTNERS, et al.,**

Defendants,

Case No. 1:20cv484

**Hon. Rossie D. Alston, Jr.
Hon. Theresa Buchanan**

**MOTION TO FILE DOCUMENTS
UNDER SEAL**

800 HOYT LLC,

Intervening Interpleader Plaintiff,

v.

**BRIAN WATSON, WDC HOLDING
LLC, PLW CAPITAL I,
LLC.AMAZON.COM, INC, and
AMAZON DATA SERVICES, INC.**

Interpleader Defendants.

Pursuant to Local Rule 5(C) and Section 11.e of the June 4, 2020 Protective Order entered in this case (Doc. 55), Defendants Carleton Nelson and Cheshire Ventures, LLC (“Nelson Defendants”) file this Motion to file an unreacted version of their reply in support of their motion to compel damages discovery and exhibits N and O to the Declaration of Adam R. Smart in support thereof, under seal. The Nelson Defendants file this motion because Plaintiffs have designated certain material in the reply as confidential as well as having designated the exhibits thereto as

confidential or highly confidential. The Nelson defendants will also file a redacted version of the reply on the public ECF.

Description of Documents

- Exhibit N is a true and correct copy of an amendment between IPI and Amazon to the lease transaction known as IAD144, dated May 22, 2020.
- Exhibit O is a true and correct copy of an Estoppel Certificate for the lease transaction known as IAD144, executed after May 1, 2020 by Amazon

Pursuant to Local Rule 5, because Plaintiffs have designated the material confidential, Plaintiffs must file a response to the motion complying with requirements of Local Rule 5 and submit a proposed order.

WHEREFORE, the Nelson Defendants requests that the Court enter an Order allowing an unredacted reply and foregoing exhibits to the declaration of Adam R. Smart be filed under seal.

May 5, 2022

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CERTIFICATE OF SERVICE

I hereby certify that on May 5, 2022, a true and correct copy of the foregoing has been served upon the following via email:

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Dated: May 5, 2022

/s/ Rachel Friedman
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